

## STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION

A TOTAL

October 4, 1993

Ms. Jane Anderson
EPA State Coordinator
Superfund Support Section (HSS-7)
US EPA Waste Management Division
JFK Federal Building
Boston, MA 02203-2211



SDMS DocID

583398

Subject:

Draft Site Inspection Report Review

Bristol Company Waterbury, CT

**CERCLIS No. CTD981898406** 

TDD No. 9105-83-AWS

Dear Ms. Anderson:

I have received for review a copy of the draft Site Inspection (SI) report for the Bristol Company, in Waterbury. The final Site Inspection report was received prior to the end of the comment period specified on the cover letter accompanying the draft report. Please incorporate the following comments into the appropriate files.

- The report states that the companies that have utilized the 40 Bristol Street facility "manufactured similar products". The name of the company "American Chain and Cable" implies that this company manufactured something other than temperature controls, chemical sensors, recorders, indicating devices, and other such industrial instrumentation. Did the former companies at this site in fact produce similar devices, or instead, produce products requiring similar processes and materials?
- Four steel above ground tanks have been mentioned in the report. The tanks were dated using visual observations of rusting. It is unclear how this dating technique is performed.
- The material sampled near a large exhaust fan located on the west side of the building was said to have been sediment. Should this material actually be described as soil?
- Analytical results of WESTON/ARCS samples use reference concentrations for certain compounds. Many of these compounds do not occur naturally. Should such compounds be referenced in such a manner, or should their analytical concentration simply be presented?

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- When referring to the Federal Maximum Contaminant Level (MCL), it should be noted that these levels are used specifically for drinking water.
- I would like to clarify the status of the site on the Inventory of Hazardous Waste Sites in Connecticut, mentioned on page 11 of the narrative. Bristol Babcock was nominated and published in the January, 1987 Inventory of Hazardous Waste Sites in Connecticut due to the alleged presence of a historic metal hydroxide lagoon. A June 2, 1987 letter from CT DEP to EEW Management Inc. states, "Since it appears that wastes were not disposed of on-site, the Bristol Company should not have been included on the Hazardous Waste Inventory Report". On December 23, 1986, a Form III Declaration for the Transfer of an Establishment (according to the Connecticut General Statutes, §§22a-134 to 22a-134(d), inclusive) was filed with CT DEP pertaining to the subject site. A Form III is used where a Negative Declaration can not be made due to the presence of hazardous waste on-site. Since then, remedial measures have been undertaken at Bristol Babcock because of the presence of trichloroethene and polychlorinated biphenyls(PCBs) found present in the soil and the groundwater below the site. The site remains included on the Inventory of Hazardous Waste Sites in Connecticut.
- The remedial activities associated with the release of PCBs mentioned in the narrative have not been completed to date. Drums containing PCB contaminated soil still remain on-site as a result of a misunderstanding between the site owner and the clean-up contractor. The CT DEP PCB Management Section is aware of this situation, and has received correspondence from the property owner stating the possibility of hiring yet another contractor to remove the remaining drummed PCB waste. This action has not commenced to date. I have enclosed the pertinent correspondence on file at CT DEP regarding this issue. If you have any further questions regarding this matter, please contact Lori Saliby of CT DEP Bureau of Waste Management, Pesticide, PCB, UST, and Marine Terminal Management Division, at (203)566-4630, X-2047.

If you have any questions regarding this comment letter, please feel free to contact me at (203) 566-7202.

Sincerely,

Thomas R. Neville

Environmental Analyst II

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TRN:trn